REMARKS

Claims 1-41 are pending in this application. Claims 1, 8, 16, 20, 21, 24, 29, 30, 35, and 37 have been amended to further define the invention. No new matter has been entered through these amendments.

Obviousness-Type Double Patenting Rejection

An offer is made to submit a terminal disclaimer in the commonly owned, related application serial no. 10/729,663, filed on December 5, 2003 to overcome any obviousness-type double patenting rejection.

Rejections under 35 U.S.C. § 102

Applicant respectfully requests reconsideration of the rejection of claims 1-29, 31-39, and 41 under 35 U.S.C. § 102 as being unpatentable over U.S. Patent Application No. 6,347,153 to Triplett et al. ("Triplett") in light of the amendments and arguments presented below.

The Examiner asserts that Triplett discloses all of the features of independent claim 1. Claim 1, as amended, includes the feature of subtracting the intermediate image data from corresponding results from b), among other features. This feature is not disclosed or taught by Triplett. Triplett utilizes a fuzzy classification scheme that enables weighted coefficients to be assigned to image data exhibiting characteristics of multiple types of image categories. Triplett eliminates the need for the image categories to be assigned in a mutually exclusive manner. A classification vector is assigned to each area of the image data and a member value of the vector is associated with each pre-defined image category (see column 10, lines 50-65). Each pixel is associated with a member value (between 0 and 1) in three classes, which act similar to weighted coefficients (see column 12, line 56 through column 13, line 45, and column 15, line 59 through column 16, line 37). Claim 1, as amended, combines the image data detected at different resolutions and then subtracts this result from the image data at one of the different resolutions. Nowhere does Triplett disclose this feature. Claims 2-7 depend from claim 1 and are not anticipated by Triplett for at least these reasons. Applicant would also like to point out that

claim 5 includes the feature of selecting halftone dots from data resulting from the logical AND operation of claim 4. The Examiner asserts that this feature is disclosed in column 6, lines 6-21 and column 13, lines 26-33. Applicant fails to see where in column 6 any logical operation remotely similar to that specified in claim 5 is mentioned. The portion of column 13 referred to by the Examiner discusses selecting a minimum value for the conditions since the fuzzy logic treats ANDed statements in this manner. Applicant respectfully requests that the Examiner specify how selecting a minimum value for the conditions based on ANDed statements discloses selecting halftone dots, if this rejection is maintained.

Claim 8, as amended, includes the features of logically combining corresponding edge data detected at multiple frequencies and subtracting the combined edge data from edge data associated with one of the multiple frequencies, among other features. Triplett fails to disclose or teach these features. Claims 9-15 depend from claim 8 and are not anticipated by Triplett for at least these reasons.

Claim 16, as amended, includes the feature of program instructions for subtracting the intermediate image data from corresponding results from detecting edges having the second resolution, among other features. Triplett fails to disclose or teach these features. Claims 17-19 depend from claim 16 and are not anticipated by Triplett for at least these reasons.

Claim 20, as amended, includes the features of program instructions for logically combining corresponding edge data detected at multiple frequencies and program instructions for subtracting the combined edge data from edge data associated with one of the multiple frequencies, among other features. Triplett fails to disclose or teach these features. Claims 21-23 depend from claim 20 and are not anticipated by Triplett for at least these reasons.

Claim 24, as amended, includes the feature of subtracting a logical combination of the image data at the first and second scale from corresponding image data at the second scale, among other features. Triplett fails to disclose or

teach these features. Claims 25-29 depend from claim 24 and are not anticipated by Triplett for at least these reasons.

Claim 30, as amended, includes the features of circuitry for separately filtering the image data at multiple resolutions, and circuitry for combining corresponding separately filtered image data and subtracting the combined image data from image filtered at one of the multiple resolutions, among other features. Triplett fails to disclose or teach these features. Claims 31-34 depend from claim 30 and are not anticipated by Triplett for at least these reasons.

Claim 35, as amended, includes the feature of logic for combining an output of the first branch with an output of the second branch and for subtracting the combined output from the output of the second branch, among other features. Triplett fails to disclose or teach these features. Claims 36-39, and 41 depend from claim 35 and are not anticipated by Triplett for at least these reasons.

Rejections under 35 U.S.C. § 103

Claims 30 and 40 were rejected under 35 U.S.C. § 103 as being unpatentable over Triplett in view of US Patent No. 4,288,821 to Lavallee et al (Lavallee). In light of the amendments to claims 30 and 35, Applicant respectfully requests withdrawal of this rejection.

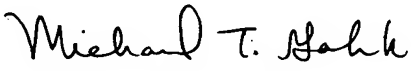
As mentioned above, claim 30, as amended, includes the features of circuitry for separately filtering the image data at multiple resolutions, and circuitry for combining corresponding separately filtered image data and subtracting the combined image data from image filtered at one of the multiple resolutions, among other features. Triplett fails to disclose or teach these features, and Lavallee fails to cure the deficiencies of Triplett.

Claim 40 depends from claim 35. Claim 35, as amended, includes the feature of logic for combining an output of the first branch with an output of the second branch and for subtracting the combined output from the output of the second branch, among other features. Triplett fails to disclose or teach these features, and Lavallee fails to cure the deficiencies of Triplett.

Furthermore, Applicant respectfully submits that there is no motivation to combine the references as suggested by the Examiner. The embodiments described within Triplett are not conducive to screening operations (see column 19, lines 39-51). Triplett gets around this issue by replacing the screening operation with a linear operation (see column 19, lines 52-58). Accordingly, if the Examiner maintains this rejection, Applicant respectfully requests that the Examiner elaborate as to why one skilled in the art would disregard this requirement of Triplett.

In view of the foregoing, Applicant respectfully submits that all of the pending claims are in condition for allowance. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at **(408) 952-6126**. Applicant respectfully requests favorable reconsideration of the present application.

Respectfully submitted,



Michael T. Gabrik
Registration No. 32,896

Please address all correspondence to:

Epson Research and Development, Inc.
Intellectual Property Department
150 River Oaks Parkway, Suite 225
San Jose, CA 95134
Phone: (408) 952-6000
Facsimile: (408) 954-9058
Customer No. 20178

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